

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

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JONATHAN MONSARRAT,

*Plaintiff,*

v.

BRIAN ZAIGER dba  
ENCYCLOPEDIADRAMATICA.SE,

*Defendant.*

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CIVIL ACTION NO. 17-cv-10356-PBS

**HEARING REQUESTED**

**PLAINTIFF'S MOTION TO AMEND COMPLAINT**

Pursuant to FRCP 15 (a) (2) and LR 15.1 the plaintiff Jonathan Monsarrat files this Rule 15(a)(2) Motion to Amend seeking leave to file an Amended Complaint in which the Doe defendants are deleted and Defendant Brian Zaiger is sued as the owner/operator of the website Encyclopedia Dramatica. For the reasons set forth in his Memorandum in Support, the plaintiff Jonathan Monsarrat requests leave to file the Amended Complaint appended hereto as Exhibit A.

Plaintiff will file a separate motion to file under seal Exhibits C and D to the proposed amended complaint.

**PLAINTIFF REQUESTS A HEARING ON THIS MOTION.**

DATED: October 18, 2017

Respectfully submitted,

JONATHAN MONSARRAT,  
Plaintiff,

By his attorneys,

ss/ Richard A. Goren

Richard A. Goren, Esq. BBO #203700

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#### **CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 7.1**

I hereby certify that on October 12, 16, and 17 2017, I conferred by email with the defendant's counsel and attempted in good faith to resolve or narrow the issues.

/s/ Richard A. Goren

#### **CERTIFICATE OF SERVICE**

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF), on October 18 , 2017.

/s/ Richard A. Goren